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March 26, 2021

Jocelyn Boyd
Chief Clerk and Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia SC 29210

**Re: RE: Workshop to discuss S.C. Code Ann. Reg. 103-823, including proposed
Minimum Filing Requirements for future rate application filings Docket No. 2020-
247-A**

Dear Ms. Boyd:

This letter is being submitted on behalf of Lockhart Power Company (“Lockhart Power”) in response to a notice dated March 18, 2021, from the Public Service Commission Staff (the “Commission Staff”) seeking comments on the Commission Staff’s proposed minimum filing requirements (“MFRs”) for future rate case applications.

Lockhart Power respectfully requests that the Commission not adopt mandatory uniform MFRs for rate case applications. Based on Lockhart Power’s previous experience in working with the Commission and the Office of Regulatory Staff (“ORS”), the current process is highly effective and efficient. Any new mandatory requirements would have an adverse effect on the current process and would result in higher rate costs which ultimately would lead to increased rates for our customers without any corresponding benefit.

Each investor-owned utility is unique in its own circumstances, situations, and experiences. Implementing mandatory MFRs would create a more difficult path for any utility to explain its position and justify its specific needs. Rather than clarifying the current process, this new proposed approach appears to create unnecessary complexities.

Mandatory MFRs for rate case applications would disproportionately impact Lockhart Power as compared to other much larger investor-owned utilities in South Carolina. For example, Lockhart

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Power has only two salaried employees within its accounting department who oversee all accounting and customer service functions. Currently, preparing documentation to meet the existing filing requirements for a rate case application and responding to the subsequent ORS Additional Information Requests taxes this department and forces it to operate in excess of normal capacity during these times. Lockhart Power has always worked well with the ORS and responded in a timely manner to their requests during a rate case, and does not expect this to change going forward. However, adding additional standardized reporting documentation would strain this group's capacity and lead to additional costs that must be passed through to Lockhart Power's customers. Given that Lockhart Power's system currently serves only 6,200 customers, even the slightest increase in regulatory costs can have a significant impact on its customers' rates.

Lockhart Power's overall concern is with potentially having to comply with mandatory MFRs that are designed for its much larger peers, without regard to Lockhart Power's unique characteristics and much more limited resources. As indicated in the initial feedback provided by Lockhart Power on March 5, 2021, a number of the MFRs adopted in other states, and particularly Florida, simply do not apply to Lockhart Power. Therefore, Lockhart Power asks that the Commission reject any proposed mandatory, one-size-fits-all minimum filing requirements for rate case applications.

Thank you for the opportunity to comment on this matter.

Respectfully submitted,

BURR & FORMAN LLP



Margaret M. Fox

MMF/khh

cc: Parties of record via e-mail